

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

IN RE: DANIEL SALAZAR AND { CHAPTER 13
REBECCA JO SALAZAR, {
DEBTOR(S) { CASE NO. R19-40682-PWB
{ JUDGE BONAPFEL

SUPPLEMENTAL OBJECTION TO CONFIRMATION

COMES NOW MARY IDA TOWNSON, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The proposed plan fails to provide for the treatment of Cardinal Financial Company. However, said creditor has filed a secured claim.

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of this Debtor's (s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

/s/
Brandi L. Kirkland, Attorney
for Chapter 13 Trustee
GA Bar No. 423627

Mary Ida Townson, Chapter 13 Trustee
Suite 2200 - 191 Peachtree Street, N.E.
Atlanta, GA 30303-1740
(404) 525-1110
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R19-40682-PWB

CERTIFICATE OF SERVICE

This is to certify that on this day I caused a copy of the foregoing pleading to be served via United States First Class Mail, with adequate postage thereon, on the following parties at the address shown for each:

DEBTOR(S):

DANIEL SALAZAR
1414 PAMELA DRIVE
TUNNEL HILL, GA 30755-9616

REBECCA JO SALAZAR
1414 PAMELA DRIVE
TUNNEL HILL, GA 30755-9616

I further certify that I have on this day electronically filed the pleading using the Bankruptcy Court's Electronic Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

SAEGER & ASSOCIATES, LLC

This 13th day of June 2019

/s/

Brandi L. Kirkland, Attorney
State Bar No. 423627

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